IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

RAJ PATEL, *Plaintiff* v. THE PRESIDENT OF THE UNITED STATES JOE BIDEN, UNITED STATES, PRESIDENT DONALD J. TRUMP, UNITED STATES MILITARY, and the FEDERAL BUREAU OF INVESTIGATIONS *Defendants*	2:21-cv-01345-APG-EJY No. _____

***PRO SE* COMPLAINT**

I, Raj K. Patel (*pro se*), respectfully move this District Court for Nevada for battery/assault through a stress weapon and privileges and/or immunities I hold pursuant to the United States Constitution, including while I was Representative to the Indiana State Bar Association of the Great State of Indiana and which I carry as 2013-2014 Student Government Association President of Emory University, Inc. in Atlanta, Georgia and 2009-2010 Student Government President of the Brownsburg Community School Corporation in Brownsburg, Indiana. U.S. const., art. IV, § 2 and amend. XIV, § 1; *United Building & Construction Trades Council v. Mayor and Council of Camden*, 465 U.S. 208 (1984); *see also* 18 U.S.C. § 2385 ("political subdivision"). *See also Doe et al. v. The Trump Corp. et al.*, No. 1:18-cv-09936-LGS (S.D.N.Y. 2020), Dkt. 272 (subject matter found but denied intervention), *appeal denied* No. 20-1706 (2d Cir. October 9, 2020) *certiorari denied, Patel v. Trump Corp.*, No. 20-1513 (U.S. ___), *pending re-hearing*. Because of the number of encounters I have had with this and am having with stress weapon and the other parties involved, local, state and federal support was important.

Beyond these aforementioned statutory and constitutional matters, my First Amendment right to Free Exercise of Religion, Academic Freedom, prohibition of Establishment of Religion, Fourth Amendment unlawful search and seizure, 13th Amendment, 5th and/or 14th Amendment Due Process, the Guarantee Clause, federally-prohibited "pains" were violated, breach of contract, defamation, theft of intellectual property (my verbatim word patterns), and civil-Racketeer Influenced and Corrupt Organizations ("R.I.C.O.") Act (with possible multiple predicate crimes) violations, tortious interference in a business transaction, and honest services duties. 18 U.S.C. §§ 1931-34 and 1961 *et seq*. and 42 U.S.C. § 1983. Art. 17, § 2 of the Universal Declaration of Human Rights of the United Nations; 18 U.S.C. §§ 1961–1968 and 1343–1346; *United States v. Nixon*, 418 U.S. 683 (1974); and *Bivens v. Six Unknown Named Agents*, 403 U.S. 388 (1971).

JURISDICTION

The United States Government is a defendant.

The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States. 28 U.S.C. § 1331.

The United States Constitution, its laws, and its treaties are material to case-at-hand.

The Constitution is violated, especially the 5th Amendment Due Process, the 14th Amendment Due Process, the Privileges and Immunities Clause (*In re Quarles and Butler*, 158 U.S. 532 (1895) (including but not limited to "the right to inform the United States authorities of violation of its laws"), the Privileges or Immunities Clause, and possibly the Guarantee Clause. *See* e.g., *United Building & Construction Trades Council*, 465 U.S. at 208 and *Bivens*, 403 U.S. at 388.

Treaties of the United States which have been violated include, but are not limited to, the International Covenant on Civil and Political Rights (ICCPR), United Nations General Assembly

Resolution 2200A (XXI), the Universal Declaration of Human Rights of the United Nations, and the Convention on Cybercrime (effective July 1, 2004) ("Additional Protocol to the Convention on Cybercrime, concerning the criminalisation of acts of a racist and xenophobic nature committed through computer systems," effective March 2006), and The Definitive Treaty of Paris (1783).[1]

Acts of Congress material to the case include, but are not limited to, 18 U.S.C. §§ 1961–1968 (R.I.C.O.), 42 U.S.C. § 1981-1983 (deprivation of civil rights, 5th Amendment), or 18 U.S.C. §§ 1931-1934 (honest services).

The Monroe Doctrine (1823) and a Founding Document, the Declaration of Independence (1776) ("certain unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness"), are also material.

WELL-PLEADED COMPLAINT STANDARDS

Motions drafted by *pro se* plaintiffs "are construed liberally and held to a less stringent standard than formal pleadings drafted by lawyers." *Fed. Exp. Corp. v. Holowecki*, 552 U.S. 389, 402 (2008); *Erickson v. Pardus*, 551 U.S. 89, 94 (2007); *McNeil v. United States*, 508 U.S. 106, 113 (1993).

Under Federal Rule of Civil Procedure 8(a)(2), a pleading must contain a "short and plain statement of the claim showing that the pleader is entitled to relief." As the Court held in *Bell Atlantic Corp. v. Twombly,* 550 U. S. 544 (2007), the pleading standard Rule 8 announces does not require "detailed factual allegations," but it… must contain sufficient factual matter, accepted

1. The Definitive Treaty of Peace (Sept. 30, 1783) (*See* Yale Law School's Avalon Project, https://avalon.law.yale.edu/18th_century/paris.asp) ("promote and secure to both perpetual peace and harmony"). U.S. const., art. IV, § 1-2 (prior treaty engagement; Supremacy Clause). *See also* Paris Peace Treaty – Congressional Proclamation of Jan. 14, 1784 (*See* Yale Law School's Avalon Project, https://avalon.law.yale.edu/18th_century/parispr2.asp) (every citizen should uphold the Treaty of Paris "sincerely, strictly, and completely"). U.S. const., art. IV, § 1-2 (prior treaty engagement; Supremacy Clause).

as true, to "state a claim to relief that is plausible on its face." *Id.*, at 570. A claim has facial plausibility when the plaintiff pleads factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged. *Id.,* at 556. The plausibility standard is not akin to a "probability requirement," but it asks for more than a sheer possibility that a defendant has acted unlawfully. *Id*. and *see also Ashcroft v. Iqbal*, 556 U.S. 662 (2009). Motions "must be construed so as to do justice." Fed. R. Civ. P. 7(b) and 8(e).

For the parts in a complaint related to R.I.C.O, *H.J. Inc. v. NW Bell Tel. Co.*, 492 U.S. 229, 248-250 (1989) states that "the facts alleged in the complaint [,by a petitioner or prosecutor, must be read] in the light most favorable to petitioners…[and courts may only dismiss] the complaint if "it is clear that no relief could be granted under any set of facts that could be proved consistent with the allegations." *H.J. Inc. v. NW Bell Tel. Co.*, 492 U.S. 229, 248-250 (1989) citing *Hishon v. King & Spalding*, 467 U. S. 69, 73 (1984). "Congress drafted RICO broadly enough to encompass a wide range of criminal activity, taking many different forms and likely to attract a broad array of perpetrators operating in many different ways." *H.J. Inc. v. NW Bell Tel. Co.*, 492 U.S. 229, 248 (1989). Moreover,

> As [Supreme] Court stressed in *Sedima,* in rejecting a pinched construction of RICO's provision for a private civil action, adopted by a lower court because it perceived that RICO's use against non-organized-crime defendants was an "abuse" of the Act, "Congress wanted to reach both *legitimate' and 'illegitimate' enterprises." 473 U.S. at 499. Legitimate businesses "enjoy neither an inherent incapacity for criminal activity nor immunity from its consequences"; and, as a result, § 1964(c)'s use* "against respected businesses allegedly engaged in a pattern of specifically identified criminal conduct is hardly a sufficient reason for assuming that the provision is being misconstrued."

Sedima, S.P.R.L. v. Imrex Co., Inc., 473 U.S. 479 (1985). In the concurrence of *H.J. Inc. v. NW Bell Tel. Co.*, 492 U.S. 229, 256 (1989), Justice Scalia writes:

> However unhelpful its guidance may be, however, I think the Court is correct in saying that nothing in the statute supports the proposition that predicate acts

> constituting part of a single scheme (or single episode) can never support a cause of action under RICO. Since the Court of Appeals here rested its decision on the contrary proposition, I concur in the judgment of the Court reversing the decision below.

See generally Dred Scott v. Sandford, 60 U.S. (19 How.) 393 (1857), *United States v. Nixon*, 418 U.S. 683 (1974) (no person or no project/experiment is above the law, the Federalist Project/Experiment), *Clinton v. Jones*, 520 U.S. 681 (1997) (president's acts before becoming president are not subject to immunity), and *Nixon v. Fitzgerald*, 457 U.S. 731 (1982) (immunity limited to official acts). *See also* Fed. R. Civ. P. 21. *Cf.* parties to a case.

FACTUAL BACKGROUND

In 2015, before Professor Veronica Root Martinez, who attended Georgetown University of her undergraduate education and the University of Chicago for legal education, said a few words before the first day of Contracts Class, and the exams were not graded until February or March 2016, due to Professor Root Martinez's pregnancy-related grading delay, which changed employment summer 2016 prospective. In Summer 2017, I was hired as Assistant Rector of Keenan Hall, but I resigned, in October 2017, as I was getting ready to withdraw from Notre Dame. In 2017, Professor Veronica Root Martinez started doing the same thing with different word patterns before most of the Corporate Compliance and Ethics Course. *Doe v. Univ. of Notre Dame*, No. 3:17CV298-PPS/MGG (N.D. Ind. May. 8, 2017), p. 19 and *Ross v. Creighton University*, 957 F.2d 410, 416 (7th Cir. 1992). When walking into the University of Notre Dame, in 2015, I did not think that the law school would engage in this stress situation because of the risk of getting sued. In Professor Veronica Root Martinez's class, I received an A- in her contracts class and had an A in her Corporate Compliance and Ethics course, before I took a voluntary separation of leave in good standing in November 2017, and I think her employer is made her participate. Currently, I have a ringing sound inside my head related to this complaint.

In 2016, I noticed a few times on television that Mr. Trump eluted to a scenario which made me further suspicious about my on-going privacy breach and stress. I did not notice this happening while I was in Atlanta, Georgia as much while I was working for the City of Atlanta Law Department but did before and after I returned to Indiana.

In 2017, before and after the summer employment at Barnes & Thornburg LLP in Indianapolis, Indiana, a few Notre Dame professors said my word patterns before class started, and some of those word patterns came from a conversation, with an insubordinate undertone, in 2014 with Dr. Ajay Nair (as far as I know, Pennsylvania State University with Ph.D. degree in Education and bachelor's degree in psychology) (Ajay calls judges and justices "mentally disabled, not smart"), now-President of Arcadia University in Glenside, Pennsylvania and former Dean of Campus Life at Emory University, Inc. in Atlanta, GA and my then-horizontal and vertical subordinate, the institution where I served as a corporate officer/President of the Student Government Association/Student Body President and graduated with an "A" average (3.72/4.0 G.P.A.) and with a Bachelor of Arts in Political Science and with Honors in the Academic Study of Religion. Art. 26, § 2 of the Universal Declaration of Human Rights (UDHR) of the United Nations. At the Oxford College of Emory University, from 2011 to 2012, I was also a politically independent member of the Oxford College Republicans and served as the club's Vice President of Finance. I was also a supplemental instructor of probability and statistics at Oxford College. Most importantly, for the times I served in student government or in a club leadership, I felt like that my rights as a co-leader from The Declaration of Independence (U.S. 1776) (i.e. right to represent in a charter and freedom from interference in a charter) and my rights as a student from the Declaration of Independence (1776) (i.e. right to be represented in a charter) were violated,

which are fundamentally essential for my "[S]afety and [H]appiness." The Declaration of Independence (U.S. 1776).

In 2018, I noticed that President Trump used my exact word patterns, an identical phenomena, as aforementioned, to what was happening in his environs at the University of Notre Dame Law School in Notre Dame, Indiana prior to the time period I took a voluntary separation in good standing, in November 2017, during my fifth semester of law school, which I started in August 2015, with a scholarship from the Notre Dame Law School and a scholarship from the Indiana Conference of Legal Education Opportunity administered by the State of Indiana Supreme Court. My classmates and roommates would be able to serve as witnesses, though I think that some of my roommates were asked to participate in this situation. Needless to say, because the United State Secret Service, along with the Federal Bureau of Investigations ("F.B.I."), and other federal military and civilian agencies, shares responsibility for the security of the many United States Presidential Candidates and the President of the United States, I knew that federal law enforcement is aware that my words patterns were being transferred to President Trump, with or without legal authorization; Policy Advisors Don Jr.'s and Ivanka Trump's Instagram were also used; and my stay at a Trump Corp. International Hotel location in Washington, D.C. also included eavesdropping and e-battery through the hotel television, earlier in the contemporary ongoing COVAID pandemic (my younger brother Neal K. Patel, who is currently enrolled at Georgetown Law Center, also stayed with me in the same room). The transfer of word/data can be happening through, including but limited to, beaming (e.g., satellite, radio, soundwaves, etc.) or wire (e.g. internet, telecommunications, etc.). *Cf.* To-be-First Lady Melina Trump recites, at the 2016 Republican National Convention, identical word patterns from First Lady Michelle Obama's speech at the 2008 Democrat National Convention, in which word

patterns are not exactly identical but might be paraphrased, which demonstrates a campaign and Administration style. I also think that telecommunication companies (including cell-site simulator companies) or the F.B.I. is facilitating this enterprise; alternatively, state or local authorities, National Guard, community informants (As current U.S. President, former U.S. Vice President, former U.S. Senate President, and current 2020 U.S. Presidential Candidate Joe Biden might ask, do the selected community informants create or aim to create monolithism, with the use of a stress weapon, as being one of their tactics to create their ideal, utopian monolith? For instance, do the F.B.I.-Multi-Cultural Engagement Council (MCEC) and the community informants have social targets to re-rank their monoliths?), a private business, cultural police, or any person with paramilitary technologies can be facilitating this enterprise with President Trump is and was partaking. U.S. const. amend. II. *See also* "monolithism" in Merriam-Webster.com Dictionary (1828) ("the quality or state of being monolithic…where political monolithism inevitably leads"). *See also* "umma" Lexico.com powered by Oxford U. Press (2020) ("The whole community of Muslims bound together by ties of religion"…'In Medina, [Prophet] Mohammed established an ummah, a Muslim community, with every aspect of life - political, religious, social and economic - subject to Islamic teaching.'"). *See also* "Community Outreach" webpage at https://www.fbi.gov/about/community-outreach:

> The Multi-Cultural Engagement Council (MCEC) is composed of community ethnic, religious, and minority leaders who help the FBI better understand the cultures and committees they represent…

But see Declaration of Independence (Ajay Nair and many other non-elected and non-appointed officials as community informants and community organizers would be in violation of this Text, "deriving their just powers from the consent of the governed…To prove this, let Facts be submitted to a candid world."). *See also* Art. 18 & 29 of the Universal Declaration of Human

Rights (UDHR) of the United Nations. These community organizers have committed posterity crimes. *See also* Monroe Doctrine (1823) as extended to Her Majesty's Commonwealth of Nations – Great Britain and India (constituted as the "Sovereign Socialist Secular Democratic Republic") and https://www.un.org/en/ga/search/view_doc.asp?symbol=S/PV.8452; National Security Advisor John Bolton invoked the Monroe Doctrine in describing the Trump administration's policy in the Americas, saying "In this administration, we're not afraid to use the word Monroe Doctrine...It's been the objective of American presidents going back to [President] Ronald Reagan to have a completely democratic hemisphere," https://www.washingtonexaminer.com/news/john-bolton-were-not-afraid-to-use-the-word-monroe-doctrine.

Sometimes, though never from President Trump (R) nor Speaker Pelosi (D), the sound/tones of the words is supposed to trigger a whip/battery. The academic study of political science and political psychology calls this phenomena "word whipping" or "word lash" (a person must first be infected with a psycho-tech) and military psychology has analogous applied and executed functions. As a side note, I am not sure if the initiative of word whipping/lashing, as a matter of policy, belongs to a political party, a corporation, a home-grown terrorist group (i.e. within and from person's home, within the Homeland, etc.), a charted cultural group, a state of the United States, the United States, or a foreign power. *See also Goldwater v. Ginzburg*, 414 F.2d 324, 337 (2d Cir. 1969), *cert. denied*, 396 U.S. 1049 (defendants found guilty for compensatory and punitive damages for actual malice libel case with the use of tactical psychology). Nonetheless, as in aforementioned (3), my verbatim word patterns were taken from me, but if they were taken for public use, including but not limited to disciplinary or correctional efforts, I did not have "just compensation," pursuant to the Fifth Amendment or the Fourteenth

Amendment of the United States Constitution. U.S. const. amend. V and XIV. Theft or taking also necessitates a breach of the Fourth Amendment. U.S. const. amend. IV. Overall, I think that some thing [sic] has been misapplied or mis-enforced, and I do not know what I did to deserve this inducement and delay in my career. I also think that this situation violates the prohibition on "cruel and unusual" punishment because it permanently lowers my grades and impacts my career and social status, in the domestic and foreign contexts. U.S. const. amend. VIII; U.S. const. art. IV, § 2, cl. 2 ("Comity Clause" or "Doctrine of Comity" or "Privileges & Immunities Clause"); U.S. const. amend. XIV, § 1 ("Privileges or Immunities Clause"); and U.S. const. art. IV, § 2 ("Full Faith & Credit Clause"). I believe that all behavior was unlicensed or illegal some other way. *See also Id.* and 42 U.S.C. § 1981 ("…pains…"). *See generally* 42 U.S.C. §§ 9501 *et seq.* (Mental Health "Bill of Rights"), 9501(1)(A)(i) – (ii), & (2)(A). I voted in almost every election since I have turned eighteen (18) years old. U.S. const., amend. XV, §§ 1 & 2 and Art. 21(3) of the Universal Declaration of Human Rights (UDHR) of the United Nations (voting is a secluded right and a privilege and/or immunity and Amend. IX). Based on my observations, I am able to send a possible implementation method of depression/anxiety/stress, to this court.

In many folds, should this be a Taking, because the Taking was continuous or forcibly used for corrections, in addition to other crimes, I feel that my situation is one of "slavery" or "involuntary servitude." U.S. const. amend. XIII; *see also* 42 U.S.C. §§ 1981(a)-(c) ("Equal rights under the law"), 1982 ("Property rights of citizens"), and 1983 ("Civil action for deprivation of rights"). *See also* "slavery" in Merriam-Webster.com Dictionary (1828) ("the practice of slaveholding…the state of a person who is a chattel of another…submission to a dominating influence") and "involuntary servitude" in West's Encyclopedia of American Law, retrieved August 2020 from Encyclopedia.com ("slavery; the condition of an individual who

works for another individual against his or her will as a result of force, coercion, or imprisonment, regardless of whether the individual is paid for the labor."). *See also* Arts. 1-12 & 22 of the Universal Declaration of Human Rights.

Should my case at hand entail medical attention, all medical attention was unconsented and unnecessary and based on false information. *Collins v. Thakkart*, 552 N.E.2d 507 (Ind. Ct. App. 1990) (intentional, unconsented medical procedure through intimately connected object was battery, unlawful touching of another person); Indiana state laws and federal laws are also violated; 28 U.S.C. § 1652. Section 9501 preempts Indiana State constitution and law, per the Supremacy Clause, and is a part of Due Process and Amendment IX, and furthers the general United States constitutional rights to medical privacy and to refuse medical care. *Griswold v. Connecticut*, 381 U.S. 479 (1965); *Cruzan v. Director, Missouri Dept. of Health*, 497 U.S. 261, 270 (1990); U.S. const. art. VI, cl. 2; and *Id*. amends. V, IX, & XIV. *See also* 42 U.S.C. § 9501(2)(A). Section 9501 refers to the President's Commission on Mental Health. 42 U.S.C. § 9501, para. 1.

President Biden, who succeeded Presidents Bush, Obama, and Trump, is the Head of State of the United States and the Head of Government of the United States and stated at his inaugural address that the United States is an un-civil war; President Trump's comments only indicate support of President Biden's remarks. U.S. const. art. II, § 3. Moreover, Vice President Pence could have brought this situation from Indiana, where we both live, or Indiana State Capitol, where we both used to work, to the White House.

The privacy breach has not only defrauded me of President Trump's honest public service to protect me but also caused a loss in business opportunity and harassment by knowing that my intellectual property has been taken from me. *See* 42 U.S.C. § 1982. President Biden

owes me a similar duty, and my face-to-face interactions with the F.B.I.-South Bend and F.B.I.-Indianapolis indicate that they were asked to participate; such information could be stored in the respective government security clearances, i.e. top-top secret, top-secret, confidential, or sensitive, or individuals can be ordered to testify.

Several times in 2018, 2019, 2020, and 2021, I contacted the White House through its website to ask President Trump, both in his official capacity as President of the United States and in his personal capacity, to see whether he was aware of my situation, but I received no explicit answer. When I contacted President Obama in 2009 and 2014 or 2015 about this on-going conspiracy through whitehouse.gov, Joe Biden was Vice President of the United States.

President Biden can trigger "need to know" and terminate the on-going privacy breach and electronic battery (e.g. CDMA-controlled ringing-sound technology, etc.); or, President Trump should have ordered the United States Attorney General, as is President Trump's power, to investigate this on-going R.I.C.O. enterprise and situation, or killed the aggressors or rebellion. 18 U.S.C. § 1968; 42 U.S.C. § 1983; Guarantee Cl., U.S. const. art. IV, § 4. *But see* 18 U.S.C. § 2383. 18 U.S.C. § 1961 (sections 175–178 (relating to biological weapons) (DNC Electoral College vote winner and 2016 DNC Presidential Candidate Faith Spotted Eagle), sections 229–229F (relating to chemical weapons) (e.g. neuro-chem-psycho weapons), section 831 (relating to nuclear materials)). As I have plead, any of these individuals, if not willfully participating, could be being accessorized for these legal violations, i.e. words/sounds fly out people's mouth, or are hypnotized with aid from biological or chemical potions. I e-mailed now-Her Honor Amy Barrett and few other e-mails before leaving from my student e-mail, but I did not receive the correct e-mail address.

In 2018 and 2019, I moved President Trump, the Oval Office, and the Court of the West Wing to Order a restoration of my rights and to be free from this privacy breach and enterprise and to ensure that private enforcement companies, working for a political or personal rival, were not harassing me, including for the reason to reduce the chances of me holding political office one day, which is a form of unlawful political succession planning. 18 U.S.C. §§ 1964(b), 1968, and 1343. *See also* Arts. 12, 13, 17, 20, 25, 26, and 27, International Covenant on Civil and Political Rights (ICCPR), United Nations General Assembly Resolution 2200A (XXI). I also moved the United States Senate and its committees and the United States House of Representative and its committees. As I informed President Trump and Speaker Pelosi, I co-founded the Indiana High School Democrats-Young Democrats of America (Y.D.A.) and was later Vice Chair of the Indiana High School Democrats. While I want to keep the word patterns and scenario as sensitive information, I would like to state that the content of the word patterns is non-profane and non-explicit. Nonetheless, the word patterns were used to batter/whip me via the soundwaves as a part of this enterprise or scheme, across state (including but not limited to California, Florida, Indiana, and Georgia) and international boundaries.

Other knowledgeable parties or witnesses include my classmates, Vice President Mike Pence, Emory University, Inc. (Atlanta, Georgia) officials, University of Notre Dame (South Bend, Indiana) administration and professors, F.B.I., family members, family friends, and acquaintances, and I sued many of them in the Southern District of Indiana in Indianapolis, Indiana. *See generally Raj Patel v. Pikul Patel, Indianapolis Metro. Police Dep't, Governor Eric Holcomb, Claire Sterk, United States, Ne[a]l Patel, Shiven Patel, Vice President Michael R. Pence, Kartik Patel, Brownsburg Police Dep't, State of Indiana, Veronica Root Martinez, Kusum Patel, Speaker Nancy Pelosi, Ajay Nair, Mick Mulvaney, Emory Univ., Brownsburg Cmty. Sch.*

Corp., F.B.I., Lloyd H. Mayer, Barbara J. Fick, Kristin Pruitt, Ramesh Patel, Manisha Patel, Univ. of Notre Dame Law Sch., Kshitij ["Situ"] Mistry, and President Donald J. Trump, No. 1:2020-cv-00758 (S.D. Ind. Mar. 9, 2020); *see also Patel v. Trump. et al.*, No. 1:2020-cv-00454 (S.D. Ind. Feb. 19, 2020); *Raj Patel v. F.B.I., Univ. of Notre Dame Law Sch., Emory Univ., Indianapolis Metro. Police Dep't, and Brownsburg Police Dep't*, No. 1:2018-cv-03442 (S.D. Ind. Nov. 13, 2018); *Raj Patel v. F.B.I., Kartik Patel, Indianapolis Metro. Police Dep't, and Brownsburg Police Dep't*, No. 1:2018-cv-03443 (S.D. Ind. Nov. 13, 2018); *Raj Patel v. F.B.I., Indianapolis Metro. Police Dep't, and Brownsburg Police Dep't*, No. 1:2018-cv-03441 (S.D. Ind. Nov. 13, 2018). Prior to suing in the Indiana federal court, on August 23, 2018, the Superior Court of Hendricks County, Indiana granted me a protective order against Mr. Kartik Patel, my father and a naturalized, not-sovereign United States citizen from India. *Patel, Raj v. Patel, Kartik*, No. 32D05-1808-PO-000372 (Ind. Super. Ct. 2018). At the time I filed for a protection order against Kartik, I should have also moved the court for a protective order against Manisha Patel, my mother and a naturalized, not-sovereign United States citizen from India. Nonetheless, on July 7, 2020, I did move the Indiana Superior Court for a protective order against Manisha, and the court denied my complaint for a protective order, on August 4, 2020. *Patel, Raj v. Patel, Manisha*, No. 32D04-2007-PO-000276 (Ind. Super. Ct. 2020). Embedded within this communal aggression is religiously-motived acts and violence, which alter prospects of re-election too, as a natural-born American sovereign. U.S. const., art. II, § 1, cl. 4. *Slaughter-House Cases*, 83 U.S. (16 Wall.) 36, 71, and 77-78 (1873) ("the clause was interpreted to convey limited protection pertinent to a small minority of rights, such as the right to seek federal office"; privileges of other "butchers," applied as well to students, student government presidents, and elected and appointed officials).

These other knowledgeable parties are the individuals that President Trump, with or without actual knowledge, engaged in an "enterprise" with to defraud me and put me in a state of psychological warfare and deprived me of honest services. 18 U.S.C. §§ 1961 and 1346 and 42 U.S.C. § 1983. Nonetheless, the application and enforcement of a stress weapon on a citizen of the United States, including those in civil incapacitation, violated Original Intent of the Founding Fathers and Framers of the Constitution (1789) and appears in the Privileges and Immunities Clause, Article IV, Section 2, applicable to political subdivisions, states and the federal governments and their chartered entities. Thomas Jefferson introduced in the Virginia General Assembly and the Assembly passed "A Bill for Establishing Religious Freedom, 18 June 1779":

> *Well aware that the opinions and belief of men depend not on their own will, but follow involuntarily the evidence proposed to their minds; that* Almighty God hath created the mind free, *and manifested his supreme will that free it shall remain by making it altogether insusceptible of restraint*; that all attempts to influence it by temporal punishments, or burthens, or by civil incapacitations, tend only to beget habits of hypocrisy and meanness, and are a departure from the plan of the holy author of our religion,...that our civil rights have no dependance [sic] on our religious opinions, any more than our opinions in physics or geometry; that therefore the proscribing any citizen as unworthy the public confidence by laying upon him an incapacity of being called to offices of trust and emolument, unless he profess or renounce this or that religious opinion, is depriving him injuriously of those privileges and advantages to which, in common with his fellow citizens, he has a natural right; that it tends also to corrupt the principles of that *very* religion it is meant to encourage, by bribing, with a monopoly of worldly honours and emoluments, those who will externally profess and conform to it; that though indeed these are criminal who do not withstand such temptation, yet neither are those innocent who lay the bait in their way; *that the opinions of men are not the object of civil government, nor under its jurisdiction*; that to suffer the civil magistrate to intrude his powers into the field of opinion and to restrain the profession or propagation of principles on supposition of their ill tendency is a dangerous falacy [sic],…human interposition disarmed of her natural weapons, free argument and debate; errors ceasing to be dangerous when it is permitted freely to contradict them.
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> *... Acts passed at a General Assembly of the Commonwealth of Virginia*, Richmond: Dunlap and Hayes [1786], 26–7 cited in "82. A Bill for Establishing Religious Freedom, 18 June 1779," *Founders Online,* National Archives, https://founders.archives.gov/documents/Jefferson/01-02-02-0132-0004-0082

> citing *The Papers of Thomas Jefferson*, vol. 2, 1777–18 June 1779, ed. Julian P. Boyd. Princeton: Princeton University Press, 1950, 545–553.

In Federalist No. 42, James Madison, Father of the Constitution, states that "[t]hose who come under the denomination of free inhabitants of a State, although not citizens of such State, are entitled, in every other State, to all the privileges of free citizens of the latter; that is, to greater privileges than they may be entitled to in their own State…" Federalist No. 42. In Federalist No. 80, James Madison states that the Privileges and Immunities Clause is "the basis of the union" and is basis of the National Character. Federalist No. 80. The Supreme Court, in *Corfield v. Coryell*, 6 F. Cas. 546 (1823), also states that the Privileges and Immunities Clause, U.S. Constitution Article IV, Section 2, Clause 2 also includes the "Protection by the government; the enjoyment of life and liberty, *with the right to acquire and possess property of every kind*, and to pursue and obtain happiness and safety; subject nevertheless to such restraints as the government may justly prescribe for the general good of the whole." *Corfield v. Coryell*, 6 F. Cas. 546 (1823) (Washington, J.) (emphasis added) and U.S. const. art. IV, § 2, cl. 2 ("Privileges & Immunities Clause"); *see also* U.S. const. amend. XIV, § 1 ("Privileges or Immunities Clause"), 42 U.S.C. §§ 1981-1983. On July 12, 1816, Thomas Jefferson said to Samuel Kercheval, also known as H. Tompkinson, the following, which advocates for remedying the use of psychological weapons, such as the stress weapon:

> I am certainly not an advocate for frequent and untried changes in laws and constitutions. I think moderate imperfections had better be borne with; because, when once known, we accommodate ourselves to them, and find practical means of correcting their ill effects. But I know also, that laws and institutions must go hand in hand with the progress of the human mind. As that becomes more developed, more enlightened, as new discoveries are made, new truths disclosed, and manners and opinions change with the change of circumstances, institutions must advance also, and keep pace with the times. We might as well require a man to wear still the coat which fitted him when a boy, as civilized society to remain ever under the regimen of their barbarous ancestors. Thomas Jefferson to Samuel Kercheval. *The Thomas Jefferson Papers at the Library of Congress*, Series 1:

General Correspondence 1651 to 1827, Retrieved from the Library of Congress, https://www.loc.gov/item/mtjbib022494/.

As aforementioned, this enterprise was ongoing when I was enrolled at the University of Notre Dame Law School, from August 2015 to November 2017, in order to decrease my academic performance and social performance. Per my academic performance, grade deflation happened by inducing stress, via a "stress weapon," rather than by professors lowering my grade, although that too could have happened along with the inducement of stress. Materially put, on the Notre Dame Law School grading curve, which limits the number of honorable grades (e.g. "A," "A-," and "B+") and which varies based on class size, scientifically-statistically stated, a handful of my fellow gradees and classmates, effectively, have a higher grade than they otherwise would but for the inducement of stress, and many of my fellow gradees and classmates have a relatively higher academic and social standing than they otherwise would but for the inducement of stress, which all also entails to appropriating my identity, and produced arbitrary undergraduate and law school admissions results. *Contra* "dyslexia" as a political disease; *see* "dyslexia" in Lexico.com powered by Oxford U. Press (2020) ("A general term for disorders that involve difficulty in learning to read or interpret words, letters, and other symbols, but that do not affect general intelligence."); *see also* "stress" in *Id.* ("Pressure or tension exerted on a material object…'the distribution of stress is uniform across the bar'…'The degree of stress differs in each specific case'…'he's obviously under a lot of stress'…'the stresses and strains of public life'…'he has started to lay greater stress on the government's role in industry'"). *Compare Id. with* "terrorist" in Lexico.com powered by Oxford U. Press (2020) ("The search is on for the terrorists and politicians are trying to calm the public down.'…'Terrorism is not a nation and terrorists are not an army that you can send troops against.'…'The great and the good are telling us that we must not change policy in deference to terrorists.'…'Most terrorists know

exactly what they are doing and the effect they want to produce.'…'The biggest danger to society is what would happen if these terrorists did get their own way.'…'I could see real terror on their faces and thought it might be a terrorist attack.') *and* (Is the word "stressors" an euphemism for "terrorizers" or "terrorists?"). *See* Foreign Com. Cl., U.S. const. art. I, § 8, cl. 3. But for this peril/conspiracy/assault/battery, I would have easily had a cumulative grade point average of 4.0 to 3.5 out of a 4.0, while maintaining my rigorous exercise schedule. 18 U.S.C. §§ 111 *et seq*.; 175 *et seq*., 1961 *et seq*., 1951 *et seq.*[2], and 2510 *et seq*. and 42 U.S.C. §§ 1981-1983. Nonetheless, I was elected by my law school peers as a Representative to the Indiana State Bar Association from the Notre Dame Law School Student Bar Association.

In addition, one of the purposes of the enterprise might be to target me politically, especially because my honor's thesis, titled "Weight Loss as a Religion," was supported by Faith Spotted Eagle, a 2016 United States Presidential Candidate from the Democratic National Committee and receiver of one (1) vote from the constitutionally-established Electoral College (my honors thesis and Faith's activism to end biological-warfare and heal post-traumatic stress disorder can be categorized under Commander-in-Chief Barack Obama's policy or law on identity politics). In fact, I had lost 50 pounds during the freshman year of my high school, from 200 pounds to 150 pounds. During the first two years of my college, I gained weight, about 30 to 40 pounds, and I lost this weight, before my junior year, which was primarily through P90X. Therefore, because of my recent severe weight gain (almost 150 pounds of fat mass) caused by this stress weapon, which started a few months prior to my voluntary separation of leave in good standing, but exceptionally after May 2018, I feel a loss of legitimacy, personal achievement, embarrassment, health, athleticism, beauty, and personal happiness. In fact, I was at my fittest,

2. *Asahi Metal Indus. Co. Ltd. v. Superior Court*, 480 U.S. 102 (1987) (supply-chain terrorism and stream of commerce terrorism).

through cardiovascular activities and weight lifting, from April 2015 to February 2016. As this situation was on-going prior to writing and getting approved my honors thesis, I do not think that my scholarship made me a target of this stress weapon, but maybe a group read my scholarship incorrectly. U.S. const. amend. I. Maybe the stress weapon is the next edition of discrimination at universities, including against Asian-Americans. Anemona Hartocollis and Giulia McDonnell Nieto del Rio, "Justice Dept. Says Yale Discriminates. Here's What Students Think.," *New York Times*: https://www.nytimes.com/2020/08/14/us/yale-asian-american-discrimination.html. *Cf. Students for Fair Admissions, Inc. v. Harvard*, No. 14-cv-14176-ADB (D. Mass. September 30, 2019), Dkt. 679.

Overall, since November 2017, I have taken unplanned and unwanted time off of law school which unduly and unwantedly effects my career timeline and unjustly limits my career choices, which all also causes me extreme emotional distress. Interestingly, the average cost of keeping a state prisoner is $31,000, from the year 2010 to 2015, across the Sister States. Chris Mai and Ram Subramanian, *The Price of Prisons, Examining State Spending Trends*, 2010-2015, Vera Institute of Justice: https://www.vera.org/publications/price-of-prisons-2015-state-spending-trends. In federal prison, the average cost per inmate, in FY 2017, was $36,299.25. "Annual Determination of Average Cost of Incarceration," Bureau of Prisons, Department of Justice, 83 FR 18863 (April 30, 2018). Although state and federal prison and civil incapacitation and civil confinement are different, I had the undue burdens of paying for the cost of this civil incapacitation, which unduly changes my commercial participation for this time period and afterwards, and, unlike in federal or state prison cases, taxpayers only paid mild costs. U.S. const. amends. XIII and XIV. Mind you, I neither abused controlled substances nor have committed any crime which could have caused this situation.

On May 22, 2020, I filed a Motion of Intervention with the Clerk of the Southern District Court in *Doe et al. v. The Trump Corp. et al.*, No. 1:18-cv-09936-LGS (S.D.N.Y. ____). *Id.*, Dkt. 268. *Doe et al. v. The Trump Corp et al.*, No. 1:18-cv-09936-LSG (S.D.N.Y. May 26, 2020), Dkt. 272 (not denying subject-matter jurisdiction), *appeal denied* No. 20-1706 (2d Cir. October 9, 2020) (not overturning the S.D.N.Y. decision), *certiorari denied, Patel v. Trump Corp.*, No. 20-1513 (U.S. 202_), *pending re-hearing*. *Compare* Compl., *Doe et al. v. The Trump Corp et al.*, No. 1:18-cv-09936-LSG (S.D.N.Y. May 26, 2020), Dkt. 268 *with here* (entirely different and more encompassing complaint).

As of July 14, 2021, in distribution of Peace and Order, this enterprise and situation is mildly ongoing and began fifteen years ago (i.e. 2005 or before), which is approximately the amount of time Doe et al. say they have been defrauded by President Trump's enterprise with the American Communication Network (A.C.N.).

This complaint and a Motion for *IFP* to the District Court for the District of Columbia follows.

DEMAND FOR RELIEF

(1) Respective orders to fulfill the statutory and constitutional obligations required to me, including but not limited to *writ of mandamus* and a *writ quo warranto*.

(2) Enforcement and application of the privileges and immunities clauses and Full Faith and Credit Clauses.

(3) Rectify academic information. 28 U.S.C. §§ 2201 and 2202.

(4) I ask for earned damages totaling multimillion or billions – $330M - $3.76B – solely based on the trickle effect.

(5) General order to seize all unlawful force over me or *writ of prohibition*.

(6) Transfer to the Southern District Court for New York where there is subject-matter jurisdiction. *Doe v. Trump Corp.*, No.1:18-cv-09936-LGS (S.D.N.Y. 2020), Dkt. 272; Fed. R. Civ. P. 24(a)(1); 28 U.S.C. § 1631; *But see Doe v. Trump Corp.*, No.1:18-cv-09936-LGS (S.D.N.Y. 2020), Dkt. 290.[3]

(7) Other remedies which the court might deem fit, 28 U.S.C. §§ 2201 and 2202 and 5 U.S.C. §§ 552(a)(4)(B) and 702.

Dated: April 12, 2021

Respectfully submitted,

/s/ Raj K. Patel

3. *Doe et al. v. The Trump Corp et al.*, No. 1:18-cv-09936-LSG (S.D.N.Y. May 26, 2020), Dkt. 272 (not denying subject-matter jurisdiction), *appeal denied* No. 20-1706 (2d Cir. October 9, 2020) (not overturning the S.D.N.Y. decision), *certiorari denied, Patel v. Trump Corp.*, No. 20-1513 (U.S. 202_), *pending re-hearing*.

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Pro se

J.D. Candidate, Notre Dame L. Sch. 2021 or 2022
President/Student Body President, Student Gov't Ass'n of Emory U., Inc. 2013-2014
Student Body President, Brownsburg Cmty. Sch. Corp./President, Brownsburg High Sch. Student Gov't 2009-2010
Rep. from the Notre Dame L. Sch. Student B. Ass'n to the Ind. St. B. Ass'n 2017
Deputy Regional Director, Young Democrats of Am.-High Sch. Caucus 2008-2009
Co-Founder & Vice Chair, Ind. High Sch. Democrats 2009-2010
Vice President of Fin. (Indep.), Oxford C. Republicans of Emory U., Inc. 2011-2012